

NITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BELLA INGBER, SABRINA MASLAVI,
NEVO YEMINI, AVIGAIL TEILER, and
STUDENTS AGAINST ANTISEMITISM, INC.,

Plaintiffs,

-against-

Case No. 1:23-cv-10023-LAP
Hon. Loretta A. Preska

NEW YORK UNIVERSITY,

Defendant.

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NOTICE OF MOTION TO INTERVENE PURSUANT TO FRCP SECTION 24

PLEASE TAKE NOTICE that Proposed Intervenors Amene Husain, Rebecca Karl, and Andrew Ross hereby move this Court to intervene in the above-captioned action pursuant to FRCP Sections 24(a) and 24(b). Proposed Intervenors under FRCP Section 24(a) claim an interest in First Amendment rights and academic freedom relating the subject of the action, and are so situated that disposing of the action may as a practical matter impair or impede their First Amendment rights and academic freedom, and that existing parties fail utterly adequately to represent those interests. Under FRCP Section 24(b), they assert that they have both claims and defenses, arising from the First Amendment and academic freedom interests, which share with the main action a common question of law or fact, the constitutionality under the First Amendment of the IHRA Standards. In support of this Motion, Proposed Intervenors rely upon and incorporate by reference: (i) their accompanying Memorandum of Law; (ii) the accompanying Declaration of Amin Husain, dated March , 2024; (iii) the accompanying Declaration of Rebecca Karl, dated March , 2024; (iv) the accompanying Declaration of Andrew Ross, dated March , 2024; (v) the accompanying proposed answer to the Complaint.

DATED: April 2, 2024

Respectfully submitted,

/s/ Jonathan Wallace

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Attorney for Proposed Intervenors